

MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
425 Market Street
San Francisco, California 94105-2482
Telephone: 415.268.7000
Facsimile: 415.268.7522

KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsfllp.com
HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsfllp.com
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
Washington DC 20005
Telephone: 202.237.2727
Facsimile: 202.237.6131

WILLIAM CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
SHAWN RABIN (*Pro Hac Vice*)
srabin@SusmanGodfrey.com
SUSMAN GODFREY LLP
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019-6023

Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendant.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
ESTHER KIM CHANG IN SUPPORT
OF DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO, LLC'S
SUPPLEMENTAL BRIEF IN
SUPPORT OF MOTION TO STRIKE
VAGUE AND OVERBROAD TRADE
SECRET CLAIMS**

Judge: The Honorable William Alsup

Trial Date: October 10, 2017

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and
6 Ottomotto LLC's Supplemental Brief in Support of Motion to Strike Vague and Overbroad Trade
7 Secret Claims.

8 2. Attached as **Exhibit 1** are true and correct excerpts of the August 24, 2017
9 Opening Expert Report of Lambertus Hesselink, Ph.D.

10 3. Attached as **Exhibit 2** are true and correct excerpts of the April 26, 2017
11 deposition of Gregory Kintz.

12
13 I declare under penalty of perjury under the laws of the United States that the foregoing is
14 true and correct. Executed this 28th day of August, 2017, in San Francisco, California.

15
16 /s/ Esther Kim Chang

17 ESTHER KIM CHANG

18
19
20 **ATTESTATION OF E-FILED SIGNATURE**

21 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
22 Declaration. In compliance with General Order 45, X.B., I hereby attest that Esther Kim Chang
23 has concurred in this filing.

24 Dated: August 28, 2017

25 /s/ Arturo J. González

26 ARTURO J. GONZÁLEZ